UNITED STATES DISTRICT COURT DISTRICT OF PUERTO RICO

In re:

The Financial Oversight and Management Board for Puerto Rico,

as representative of

The Commonwealth of Puerto Rico, et al.,

Debtors.¹

PROMESA Title III No. 17 BK 3283-LTS (Jointly Administered)

INFORMATIVE MOTION OF COBRA ACQUISITIONS LLC REGARDING ITS REQUEST TO BE HEARD AT THE DECEMBER 9-10, 2020 OMNIBUS HEARING

Cobra Acquisitions LLC ("<u>Cobra</u>"), by and through its undersigned counsel, submits this informative motion in response to the *Order Regarding Procedures for December 9-10, 2020 Omnibus Hearing* (Dkt. No. 15295 in Case No. 17-3283) (the "<u>Order</u>"), and respectfully states as follows:

1. Abid Qureshi and Tom McLish of Akin Gump Strauss Hauer & Feld LLP will appear telephonically on behalf of Cobra at the December 9-10, 2020 Omnibus Hearing and seek to be heard on the *Status Report Pursuant to June 5, 2020 Order Regarding Cobra Acquisition*

The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19 BK 5523-LTS) (Last Four Digits of Federal Tax ID: 3801). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

LLC's Motion for Allowance and Payment of Administrative Expense Claim (Dkt. No. 15308 in Case No. 17-3283).

- 2. Alana M. Vizcarrondo-Santana, Esq. of Reichard & Escalera, LLC, will appear telephonically at the same hearing.
- 3. Cobra reserves its right to be heard on any matter presented to the Court and to respond to any statements made by any party related to the above-captioned Title III cases, or any adversary proceeding pending in the Title III cases, to the extent it impacts the rights, claims, or interests of Cobra.

[Signature page follows]

DATED: December 3, 2020

Respectfully submitted,

REICHARD & ESCALERA, LLC

/s/ Rafael Escalera Rodríguez Rafael Escalera Rodríguez USDC-PR No. 122609 escalera@reichardescalera.com

/s/Sylvia M. Arizmendi Sylvia M. Arizmendi USDC-PR No. 210714 arizmendis@reichardescalera.com

/s/ Alana Vizcarrondo-Santana Alana Vizcarrondo-Santana USDC-PR No. 301614 vizcarrondo@reichardescalera.com

255 Ponce de León Avenue MCS Plaza, 10th Floor San Juan, PR 00917-1913 Telephone: (787) 777-8888 AKIN GUMP STRAUSS HAUER & FELD LLP

/s/ Thomas P. McLish
Thomas P. McLish (pro hac vice)
tmclish@akingump.com

Scott M. Heimberg (pro hac vice) sheimberg@akingump.com

Allison S. Thornton (*pro hac vice*) athornton@akingump.com

2001 K Street, N.W. Washington, DC 20006 Tel: (202) 887-4000 Fax: (202) 887-4288

and

Ira S. Dizengoff (pro hac vice)
Philip C. Dublin (pro hac vice)
Abid Qureshi (pro hac vice pending)
idizengoff@akingump.com
pdublin@akingump.com
aqureshi@akingump.com

Akin Gump Strauss Hauer & Feld LLP One Bryant Park New York, New York 10036 Telephone: (212) 872-1000 Facsimile: (212) 872-1002

CERTIFICATE OF SERVICE

We hereby certify that on this same date, we electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for the parties of record.

/s/Alana M. Vizcarrondo-Santana USDC-PR 301614